

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

INTERFOCUS INC., a California Corporation,

Plaintiff,

v.

Hangzhou Hibaby Technology Co., Ltd., and

Hibobi Technology Limited

Defendants.

Case No.: 1:22-cv-02259

Honorable Steven C. Seeger

**THE FOURTH DECLARATION OF ZHIXIONG (OWEN) LIU IN SUPPORT OF
DEFENDANTS' SUPPLEMENTAL BRIEF REGARDING
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION**

I, Zhixiong (Owne) Liu , declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am the Vice President, Chief Marketing Officer of Hibobi.

3. Attached as Exhibit 1 is a true and accurate summary of the take-down record of each of the asserted copyrighted work as of November 17, 2020, including 1) the date and time

when each accused product was taken down; 2) the U.S. sales of such accused product; and 3) the initial listing date of such products. The total U.S. sales at issue is \$2,922.75.

4. Attached as Exhibit 2 is true and accurate excerpts of Hibobi platform's frontend, backend systems, and summaries showing the date and time when each accused product was removed from Hibobi's listing. When a product was taken down, all images for that product were also taken down. This is a detailed version of Exhibit 1.

5. To date, Hibobi has removed all accused products and images identified by Plaintiff and will not put them back.

6. Hibobi has established infringement notice email address, infringementnotice@hibobi.com. To the extent Plaintiff identifies any infringing products and sends a notice to this email address, Hibobi will remove the identified products within 24 hours.

7. Hibobi does not intend to use the allegedly infringing images in the future.

8. Hibobi has over 2,800 listed products in the U.S. market based on the data collected on October 20, 2022. Hibobi has over 6,800 listed products worldwide based on the data collected on October 20, 2022.

9. On November 18, Plaintiff provided two new exhibits not in the Amended Complaint. These two new exhibits were captured on <https://www.babiesclotheswholesale.com/> and <https://www.riolio.com/>. They are for one same product. Within 90 minutes of the notice, Hibobi located and removed the product and all related images from all their platforms. The removal record is in Exhibit 3, and the total U.S. sales of the product is \$4,177.08.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 18, 2022, in Hangzhou, Zhejiang, China.

Zhixiong. Liu.
Zhixiong (Owen) Liu